

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NIKE, INC.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No. 21-cv-00329

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Nike, Inc. (“Plaintiff” or “Nike”) files this Motion requesting leave to file the following documents under seal: (1) Schedule A attached to the Complaint, which lists the fully interactive, e-commerce stores operating under the seller aliases (the “Seller Aliases”) and the e-commerce store urls under the Online Marketplaces; and (2) Exhibit 3 to the Declaration of Joe Pallett, which includes screenshot printouts showing the e-commerce stores operating under the Seller Aliases.

In this action, Nike is requesting temporary *ex parte* relief based on an action for trademark infringement, counterfeiting, and false designation of origin. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to grant relief. Once the temporary

restraining order has been served on the relevant parties and the requested actions are taken, Nike will move to unseal these documents.

Dated this 20th day of January 2021.

Respectfully submitted,

/s/ Justin R. Gaudio

Amy C. Ziegler

Justin R. Gaudio

RiKaleigh C. Johnson

Jake M. Christensen

Greer, Burns & Crain, Ltd.

300 South Wacker Drive, Suite 2500

Chicago, Illinois 60606

312.360.0080

312.360.9315 (facsimile)

aziegler@gbc.law

jgaudio@gbc.law

rjohnson@gbc.law

jchristensen@gbc.law

Counsel for Plaintiff Nike, Inc.